

**Exhibit A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**Antoine Group, LLC, et al.**  
**Plaintiff**

**v.**

**Opulent Digital Specialists, LLC, et al.**  
**Defendant**

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**Case No. 4:23-cv-02524**

**PLAINTIFF'S REQUESTS FOR PRODUCTION**

TO: Defendant, Opulent Digital Specialists, LLC, et al through their attorneys of record, Mr. J. Reese Campbell, EaDo Law, PLLC, 3401 Harrisburg Blvd, Suite H2 Houston, TX 77003

1. Plaintiffs, in accordance with Rules 34 and 69 of the Federal Rules of Civil Procedure, requests that you produce for inspection and copying the material hereafter described and that you respond to the following Requests for Production.

2. Your responses to the Requests for Production must be served no later than thirty (30) days after the service of this pleading.

**REQUESTS FOR PRODUCTION**

3. Each item labeled "REQUEST FOR PRODUCTION" is a Request for Production propounded pursuant to the provisions of Rule 34 of the Federal Rules of Civil Procedure, and you are required to respond to each such Request within thirty (30) days of service.

4. You are requested to separately number each item which will be produced pursuant to these Requests for Production with a separate and distinct number or similar identifying designation, and to file your written response to these Requests, stating with regard to each Request, the identification or exhibit numbers of the specific items being produced in response to each Request.

5. Items which are required to be produced in response to more than one Request may be listed by number in response to each Request, but the item itself need only be produced one time.

All items to be produced are to be forwarded to the undersigned attorneys for Plaintiff at their offices, attached to or together with your written response.

### **DOCUMENTS TO BE PRODUCED**

**REQUEST NO. 1.** Any and all books, records, documents and instruments pertaining to real property in which the company<sup>1</sup> owns any interest, legal or equitable, including, but not limited to, documents of title, mortgages and liens, leases, and all appraisals made within the last three years.

**REQUEST NO. 2.** Any and all of the company's books, records, documents and instruments pertaining to policies of life insurance upon key individuals, together with current statements of cash surrender value, pledge agreements and policy loan balances.

**REQUEST NO. 3.** Any and all books, records, documents and instruments pertaining to all stocks, bonds or other securities in which the company owns any interest, including, but not limited to, stock ledgers, original bonds, shares or certificates, collateral pledge agreements and buy-sell agreements.

**REQUEST NO. 4.** Any and all books, records, documents and instruments pertaining to all pensions, profit sharing, retirement, IRA and other employee benefit plans that the company provides or manages for the benefit of employees or in which it owns any interest, whether vested or contingent, including, but not limited to, current statements, together with a copy of the plan agreement.

**REQUEST NO. 5.** Any and all books, records, documents and instruments pertaining to all equipment, motor vehicles, airplanes, boats, trailers and motorcycles in which the company owns any interest, legal or equitable, including, but not limited to, documents of title, mortgages and liens.

**REQUEST NO. 6.** All of the company's U.S. tax returns and accompanying schedules and documents used in connection with the preparations of such returns for the last three years.

**REQUEST NO. 7.** Any and all books, records, documents and instruments pertaining to all partnerships, joint ventures, Limited Liability Companies, or other business organizations in which the company owns any interest, legal or equitable, including, but not limited to, membership agreements, stock financial statements, earnings statements, and U.S. tax returns for the last three years.

**REQUEST NO. 8.** Any and all books, records, documents and instruments pertaining to safety deposit boxes in the company's name alone or jointly with other persons, together with an itemized list of all contents.

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<sup>1</sup> "The company" refers to Opulent Digital Specialists, LLC.

**REQUEST NO. 9.** All policies of fire and casualty insurance upon real or personal property in which the company claims any interest, including a summary of costs thereof.

**REQUEST NO. 10.** Any and all books, records, documents and instruments including bank statements, deposit tickets and receipt copies, pertaining to monies earned or received by the company from any source for the last three years, including, but not limited to business revenue, contract payments, bonuses, commissions, dividends, interest, proceeds from the sale of property, gifts and reimbursements.

**REQUEST NO. 11.** Any and all books, records, documents and instruments pertaining to all debts and liabilities owed by the company, including, but not limited to, open accounts, notes, mortgages and liens and pledges.

**REQUEST NO. 12.** Any and all books, records, documents and instruments pertaining to monies owed to the company from any source as of the present date, including, but not limited to, loans, advances, refunds, debts and claims.

**REQUEST NO. 13.** Any and all books, records, documents and instruments pertaining to checking accounts, savings accounts, certificates of deposit and other accounts in any bank, savings and loan association, stock broker or other financial institution, which stand in the company's name alone, individually, or in the company's name jointly with others, or which are subject to withdrawal or control by the company for the last three years, including, but not limited to, statements deposit tickets, canceled checks, withdrawal tickets, statements of account, passbooks, certificates of deposit, books and records of account.

**REQUEST NO. 14.** A complete description of each item of property, whether real or personal, which the company claims to be the company's property and the location and value thereof, and each and every document on which the company bases its claim the location and value thereof, and each and every document on which the company base the company's claim, or which tends to support its claim, that any property, identifying each document as to the property to which it relates.

**REQUEST NO. 15.** Any and all financial statements submitted to any bank or other financial institution by the company for the last three years.

**REQUEST NO. 16.** A current detailed general ledger for the last three years.

**REQUEST NO. 17.** The most recent balance sheet, Income Statement, Aged Account Receivables and Statement of Assets available.

Respectfully submitted,

**Blazier, Christensen, Browder & Virr,  
P.C.**

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

On this the 10<sup>th</sup> day of May, 2024 the undersigned delivered a true and correct copy of the foregoing to the following counsel of record via email.

**VIA E-SERVICE**

Mr. J. Reese Campbell  
EaDo Law, PLLC  
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Houston, TX 77003  
[reese@eadolaw.com](mailto:reese@eadolaw.com)

/s/Paul K. Browder  
Paul K. Browder